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*Attorneys for Plaintiff Catalystix Inc.*

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**CATALYSTIX INC., a Nevada corporation,**

**Plaintiff.**

v.  
LEGACY CREATIVE INC., an Alberta corporation, and ANDREA REINDL MCLEAN, an individual

## Defendants.

Case No. 2:21-CV-01253- JCM-EJY

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND BRIEFING  
DEADLINES RELATED TO  
DEFENDANTS' MOTION TO DISMISS  
COMPLAINT**

Plaintiff Catalystix, Inc. (“Plaintiff”) and Defendants Legacy Creative Inc. and Andrea Reindl McLean (collectively, the “Defendants”), by and through their undersigned counsel, hereby move pursuant to Fed. R. Civ. P. 6 and Local Rule LR IA 6-1, to extend the deadline for Plaintiff to file its opposition to Defendants’ Motion to Dismiss Complaint (ECF No. 12) (the “Motion”) from November 12, 2021 to December 23, 2021 and to extend the deadline for Defendants to file their reply in support of the Motion from December 1, 2021 to January 18, 2022. This is the third request to extend the deadline to file the opposition to the Motion and the second request to extend the reply deadline.

On October 8, 2021, Defendants filed the Motion. On October 22, 2021, the Court entered an

1 Order extending the deadline for Plaintiff to file an opposition to the Motion to November 5, 2021  
2 (ECF No. 14). On November 3, 2021, the Court entered an Order extending the deadline for Plaintiff  
3 to file an opposition to the Motion to November 12, 2021 and for Defendants to file their reply to  
4 December 1, 2021 (ECF No. 16). The parties have scheduled a formal mediation with the Hon. Peggy  
5 Leen, which is set to occur on December 9, 2021. To preserve the parties and the Court's resources  
6 and to avoid any unnecessary fees and costs while the parties attempt to resolve this matter, they are  
7 requesting that the existing briefing deadlines be continued until after the parties have held mediation.  
8 If the parties are able to resolve this matter, they will provide notice to the Court. If not, the parties  
9 will proceed with the briefing schedule indicated herein. The parties do not oppose these additional  
10 extension requests. This request is made in good faith and is not intended to unreasonably delay this  
11 matter.

12       Based on the foregoing, the parties respectfully request that this Court extend Plaintiff's  
13 deadline to file its opposition to the Motion from November 12, 2021 to December 23, 2021 and to  
14 extend Defendants' reply deadline from December 1, 2021 to January 18, 2022.

15 DATED this 11<sup>th</sup> day of November, 2021.

DATED this 11<sup>th</sup> day of November, 2021.

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SNELL & WILMER LLP

17  
18 By: /s/ Brandon P. Johansson  
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24  
25 Attorneys for Legacy Creative Inc. and Andrea  
Reindl McLean

**ORDER**

26  
27  
28 IT IS SO ORDERED.

  
UNITED STATES MAGISTRATE JUDGE

DATE: November 12, 2021